

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FORTRESS CREDIT CORP.,

Plaintiff,

-against-

THAI UNION NORTH AMERICA, INC.,

Defendant.

Civil Action No. 24-cv-8399-MKV

CERTIFICATE OF SERVICE

I, Sophie Lipman, declare under 28 U.S.C. § 1746 that the following is true and correct:

(1) I am an attorney at the law firm of Kobre & Kim LLP, which is representing defendant Thai Union North America, Inc. (“Thai Union”) in the above-captioned litigation.

(2) On November 4, 2024, Thai Union filed a Notice of Removal (ECF No. 1) and exhibits thereto (ECF Nos. 1-1, 1-2, 1-3) as well as a Civil Cover Sheet (ECF No. 2) and Rule 7.1 Statement (ECF No. 3).

(3) That same day, I asked counsel for plaintiff Fortress Credit Corp. (“Fortress”) at Proskauer Rose LLP if they would consent to accept service by email of the same. By email dated November 5, 2024, Fortress’s counsel agreed to email service of these papers.

(4) By emails dated November 4 and 6, 2024, I served on Fortress’s counsel (Michael Mervis (mmervis@proskauer.com) and Rina Kim (rkim@proskauer.com)) a copy of the Notice of Removal (ECF No. 1) and all exhibits thereto (ECF Nos. 1-1, 1-2, 1-3) as well as the Civil Cover Sheet (ECF No. 2) and Thai Union’s Rule 7.1 Statement (ECF No. 3).

(5) Further, pursuant to Rule 14.9 of the Electronic Case Filing Rules & Instructions of the Southern District of New York (the “ECF Rules”), I delivered copies of (i) the ECF Rules and (ii) this Court’s Individual Rules of Practice in Civil Cases dated June 10, 2024, to counsel for Fortress via email on November 6, 2024.

I state under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 7, 2024.
New York, New York

/s/ Sophie Lipman
Sophie Lipman